



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

August 20, 2012

Naval Facilities Engineering Command, Southeast  
Attn: NAS Key West Airfield Operations EIS Project Manager  
P.O. Box 30, Building 903  
NAS Jacksonville, FL 32212

Subject: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR AIRFIELD OPERATIONS AT NAVAL AIR STATION KEY WEST, FLORIDA).

EIS Project Manager:

Pursuant to Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the U. S. Department of The Navy's Draft Environmental Impact Statement (draft EIS) for the Airfield Operations Naval Air Station (NAS) Key West, Florida. Under Section 309 of the CAA, EPA is responsible for reviewing and commenting on major federal actions significantly affecting the quality of the human environment.

**Background:**

The primary purpose of the proposed action is to sustain fleet training conducted at and associated with NAS Key West airfield for Navy tactical aviation and use by other DoD and federal agencies, while introducing new aircraft. The proposed action is needed in order to maintain the level of readiness mandated in Title 10 United States Code (USC) Part 5062. The Department of the Navy needs to continue use of NAS Key West to accomplish Navy and Marine Corps required aviation training. The Navy and DoD need to maintain the long-term viability of NAS Key West as a fleet training station for tactical aviation squadrons and for airfield operations and associated training in the Key West Range Complex by other DoD and federal agencies.

NAS Key West is comprised of approximately 6,500 acres of land distributed over several properties located in the Florida Keys, Monroe County, Florida. The approximately 4,700 acre Boca Chica Field property is NAS Key West's primary site and includes the airfield that is the subject of this EIS, as well as administrative and industrial facilities and recreational areas. Boca Chica Field is located on Boca Chica Key, approximately 5 miles east of the city of Key West in Monroe County, 156 miles southwest of Miami, and 90 air miles north of Cuba. Key West is the closest point in the United States to Cuba, South America, and the Caribbean Sea, making NAS Key West a significant military and homeland security asset, independent of its role as an aviation training venue.

This DEIS addressed the following alternatives:

- No Action Alternative – Annual airfield operations would continue to occur at a level similar to present (approximately 47,500 annual operations), support of existing capabilities would continue, no new aircraft would be introduced, and no facilities would be altered to support next generation aircraft training operations.

- Alternative 1 – Annual airfield operations would continue to be maintained at a level similar to present (approximately 47,500 annual operations), plus legacy aircraft would gradually transition to next generation aircraft, and existing facilities would be altered to meet requirements for next generation aircraft.
- Alternative 2 – Same as Alternative 1, plus provides the flexibility to accommodate additional carrier air wing Field Carrier Landing Practice (FCLP) training at NAS Key West when primary carrier air wing training locations around the U.S. are unavailable. Additional carrier air wing FCLP operations would vary annually based on availability of the primary training locations, but could total up to 4,500 additional annual operations (2,250 patterns). Total annual airfield operations could equal approximately 52,000 operations.
- Alternative 3 – Same as Alternative 2, plus provides added operational capacity and flexibility to effectively meet Navy training requirements under the Fleet Readiness Training Plan with an approximately 10 percent increase in other annual airfield operations. Total annual airfield operations could equal approximately 57,000 operations.

EPA understands that under this DEIS, the 4 alternatives or proposed action presented (including the no action alternative) will have no impacts to geology, topography, soils, air, wetlands or groundwater supplies.

#### **EPA's Concerns:**

Noise impact is EPA's primary concern. The Federal Aviation Administration (FAA) determines noise exposure at or above 65 DNL to be incompatible with residential land use. According to the DEIS, significant noise exposure to local residents is predicted for all alternatives. Because the mitigation discussed in the DEIS is primarily limited to aircraft operations, EPA recommends the Final EIS (FEIS) discuss mitigation to address residential noise exposure and the prospective Record of Decision should provide commitment targets for residential mitigation. Recommendations include: 1) residential mitigation (home buyouts and soundproofing) starting with those residences located in the highest (loudest) contours; 2) greater use of other available runways as weather and airfield operations permits. EPA is particularly concerned over noise impacts to children per Executive Order 13045: *Protection of Children from Environmental Health Risks and Safety Risks*. E.O. 13045 recognizes children may suffer disproportionately from environmental health risks and safety risks. Because their smaller ear canals magnify the sounds entering the ear canals, children's hearing may be particularly sensitive. For example, a 20-decibel difference can exist between adult and infant ears.<sup>1</sup> All four alternatives analyzed in the DEIS, including the no action alternative, indicate no noise impacts to children. While the DEIS alternatives analysis discussed the number of schools, (including day-care centers) potentially impacted at or greater than 65 DNL, However, it did not discuss the actual number of potential children, e.g., students, residents, etc., exposed to noise impacts or identify mitigation measures to diminish the noise impacts. Consequently, the FEIS should identify the population of children, analyze potential noise impacts upon them, and identify mitigation alternatives if necessary.

After all public and agency comments are considered and explored, objectively evaluate all reasonable alternatives. The Navy should identify a preferred alternative or alternatives in the Final EIS. The Final EIS should also briefly discuss the reasons for eliminating the other alternatives.

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<sup>1</sup> [www.childrenshearing.org/custom/hearing\\_health.html](http://www.childrenshearing.org/custom/hearing_health.html)

In summary, EPA has environmental concerns regarding this project as stated above, and rates this draft EIS as "EC-2" (i.e. environmental concerns with additional information requested in the final EIS). Our primary concerns relate to the data indicating that children will be impacted by noise above 65 DNL; selecting a preferred alternative; and identifying necessary mitigation alternatives. These issues should be further addressed in the FEIS.

Thank you for the opportunity to review and provide comments. If you wish to discuss this matter further, please contact Larry O. Gissentanna (404-562-8248 or [Gissentanna.larry@epa.gov](mailto:Gissentanna.larry@epa.gov)) of my staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management

Enclosures: Summary of Rating Definitions

## **U.S. ENVIRONMENTAL PROTECTION AGENCY**

### **ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA**

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

#### **RATING THE ENVIRONMENTAL IMPACT OF THE ACTION**

- **LO (Lack of Objections):** The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- **EC (Environmental Concerns):** The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- **EO (Environmental Objections):** The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:
  1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
  2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
  3. Where there is a violation of an EPA policy declaration;
  4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
  5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.
- **EU (Environmentally Unsatisfactory):** The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
  1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
  2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
  3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

#### **RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)**

- **1 (Adequate):** The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
- **2 (Insufficient Information):** The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.
- **3 (Inadequate):** The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.